



OFFICE OF COMMUNITY PLANNING  
AND DEVELOPMENT

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
WASHINGTON, DC 20410-7000

MEMORANDUM FOR: Jemine A. Bryon, Deputy Assistant Secretary for Special Needs, DN

FROM: Norm Suchar, Director, Office of Special Needs Assistance Programs, DNS *3-14-2017*

SUBJECT: Environmental Assessment and Finding of No Significant Impact under the National Environmental Policy Act (NEPA) - Notice of Funding Availability for the Fiscal Year (FY) 2018 Youth Homelessness Demonstration Program (FR-6200-N-35)

It is the finding of this office that the Youth Homelessness Demonstration Program (YHDP) Notice of Funding Availability (NOFA) does not constitute a major Federal action having an individually or cumulatively significant effect on the human environment and, therefore, does not require the preparation of an environmental impact statement.

The purpose of this NOFA is to select up to 25 communities to develop and execute a coordinated community approach to preventing and ending youth homelessness and to provide program information and application instructions for the YHDP Program. The FY 2018 funds for the YHDP were authorized by the Consolidated Appropriations Act, 2018 (Public Law 115-141, approved March 23, 2018) (the "FY 2018 Appropriations Act"). Projects awarded under the YHDP may be eligible for renewal under the Continuum of Care (CoC) Program when the initial grant term expires. The CoC Program is authorized by subtitle C of title IV of the McKinney Vento Homeless Assistance Act, (42 U.S.C. 11381-11389) (the Act), and the CoC Program regulations are found in 24 CFR Part 578 (the CoC Program interim rule).

The purpose of the YHDP is to learn how communities can successfully approach the goal of preventing and ending youth homelessness by building comprehensive systems of care for young people rather than implementing individual or unconnected projects that serve this population. Eligible activities include: new construction, rehabilitation, acquisition, rental assistance, leasing, supportive services, operating, HMIS, and planning.

Notwithstanding provisions at 24 CFR 578.31 and 24 CFR 578.99(a) of the CoC Program interim rule, and in accordance with Section 100261(3) of the Moving Ahead for Progress in the 21st Century Act (MAP-21), the NOFA provides for environmental review of YHDP projects and activities either (1) by a Responsible Entity under 24 CFR Part 58; or (2) by HUD under 24 CFR Part 50 for activities under a grant to a recipient other than a State or unit of general local government if the recipient objects in writing to the Responsible Entity performing the review and HUD makes a finding in accordance with 24 CFR 58.11(d) to perform the environmental review itself. Under this NOFA and applicable law, the recipient, its project partners, and their contractors are prohibited from undertaking any actions that are choice-limiting or could have environmentally adverse effects, including: acquiring, rehabilitating, converting, leasing, repairing, disposing of,

demolishing, or constructing property for a project under this NOFA, or committing or expending HUD or local funds for such eligible activities under this NOFA, until a responsible entity has completed the environmental review procedures required by 24 CFR Part 58 and the environmental certification and Request for Release of Funds (RROF) have been approved, or HUD has performed an environmental review under 24 CFR Part 50 and the recipient has received HUD approval of the property. HUD will not release grant funds if the recipient or any other party commits grant funds before the recipient submits and HUD approves its RROF. The environmental review may result in requirements for mitigation or selection of an alternative eligible property or other conditions.

Additionally, HUD has clarified two requirements for projects categorized as Categorically Excluded from review under the National Environmental Policy Act and not subject to 58.5 (CENST). First, all scattered-site projects, where participants choose their own unit and are not restricted to units within a pre-determined specific project site or sites, are categorized in 24 CFR 58.35(b)(1) as CENST. This now includes both tenant-based rental assistance and scattered-site leasing projects where the program participant chooses their unit. Second, the exempt or CENST form is only required for each project, not each unit.

This Office finds that issuance of this NOFA will not have a significant effect on the human environment because, prior to any grantee's commitment of funds for any activities that would have an environmental impact or limit the choice of reasonable alternatives, an environmental review of these activities under the NEPA and related laws and authorities will be done. Thus, the environmental effects of activities assisted under this NOFA will be taken into account at the appropriate time and environmental impacts will be assessed in the local setting in which they will occur.

Concurrences:

Danielle Schopp  
Danielle Schopp  
Departmental Environmental Clearance Officer

3/14/19  
Date

Danielle Schopp  
Lauren McNamara for  
Environmental Clearance Officer  
CPD Office of Environment and Energy

3/14/19  
Date

Christopher Hartneau  
Christopher Hartneau  
Environmental Clearance Officer  
Office of General Counsel

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